



Maryland Restroom Compliance Guide

A practical reference covering federal OSHA and Maryland MOSH requirements, ADA accessibility standards, and Maryland food-service rules for commercial restroom facilities.

LOYAL FACILITY SERVICES

Since 1979, Loyal has kept commercial restrooms stocked across Virginia, Maryland and Washington, DC. This guide pulls together the federal and Maryland rules that apply to commercial restrooms, so you can stay ahead of inspectors, not scramble after them.

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This guide summarizes rules in effect as of September 2026 for general information. It isn't legal advice. Requirements change, and cities and counties can add their own, so confirm the details with your local health department, building official or attorney.

OSHA Federal Requirements

OSHA's sanitation standard, **29 CFR 1910.141**, sets the baseline for restrooms in permanent workplaces across the country. It covers how many toilets you need, what every washing station must have, and how clean it all has to be.

Minimum Toilet Facilities (Table J-1)

EMPLOYEES	MINIMUM TOILETS	EMPLOYEES	MINIMUM TOILETS
1 – 15	1	56 – 80	4
16 – 35	2	81 – 110	5
36 – 55	3	111 – 150	6
Over 150: 1 additional toilet for each additional 40 employees			

Count employees of each sex separately, using the most employees present at any one time on a regular shift. Single-occupancy toilet rooms that lock from the inside don't have to be separated by sex.

What Every Workplace Restroom Needs

- Toilet rooms separated by sex, except single-occupancy rooms that lock from the inside and have at least one toilet
- Each toilet in its own compartment, with a door and partitions high enough for privacy
- Lavatories with hot and cold running water, or tepid running water
- Hand soap or a similar cleansing agent
- Paper or cloth towels, or air dryers, convenient to the lavatories
- Washing facilities kept in a sanitary condition, and the workplace kept clean
- Waste receptacles that don't leak, can be cleaned, and have a tight-fitting cover unless they stay sanitary without one
- Reasonable access: in a 1998 interpretation, OSHA said employees must be able to use the restroom when they need to, without unreasonable restrictions. "Timely access is the goal of the standard."

ADA Accessibility Standards

New and altered restrooms in public accommodations and commercial facilities must meet the **2010 ADA Standards for Accessible Design**. These are the measurements that matter most day to day.

Accessible Toilet Compartment

ELEMENT	REQUIREMENT
Compartment width	60 inches minimum
Compartment depth	56 inches minimum with a wall-hung toilet; 59 inches minimum with a floor-mounted toilet
Door	32 inches minimum clear width, measured with the door open 90 degrees
Side-wall grab bar	42 inches long minimum, 12 inches maximum from the rear wall, extending at least 54 inches from the rear wall
Rear-wall grab bar	36 inches long minimum, extending 12 inches on one side of the toilet's centerline and 24 inches on the other
Grab bar height	33–36 inches above the floor, to the top of the gripping surface
Toilet seat height	17–19 inches above the floor, to the top of the seat
Flush control	Hand-operated or automatic, on the open side of the toilet
Toilet paper dispenser	7–9 inches in front of the toilet, to the dispenser's centerline; outlet 15–48 inches above the floor; not behind a grab bar; allows continuous paper flow

Lavatories and Mirrors

ELEMENT	REQUIREMENT
Sink height	Rim or counter 34 inches maximum above the floor
Knee clearance	27 inches high and 30 inches wide minimum; at least 11 inches deep at 9 inches above the floor and 8 inches deep at 27 inches
Toe clearance	17 inches deep minimum, in the space up to 9 inches above the floor
Mirror above a sink	Bottom of the reflecting surface 40 inches maximum above the floor
Other mirrors	Bottom of the reflecting surface 35 inches maximum above the floor
Pipes under the sink	Insulated or otherwise protected, with no sharp or abrasive surfaces

Soap, Towel and Other Dispensers

ELEMENT	REQUIREMENT
Operation	Usable with one hand, without tight grasping, pinching or twisting of the wrist; 5 pounds of force maximum
Unobstructed forward reach	Operable part 15–48 inches above the floor
Forward reach over a counter or sink	48 inches maximum if it's up to 20 inches deep; 44 inches maximum if it's over 20 and up to 25 inches deep; never deeper than 25 inches. The wheelchair space in front must extend under the counter at least as far as the reach
Side reach over a counter or sink	Needs wheelchair space alongside for a side-on approach. Counter 34 inches high and 24 inches deep maximum; 48 inches maximum if it's up to 10 inches deep, 46 inches maximum if deeper

Restroom Signs

Signs identifying restrooms need raised characters duplicated in Braille, mounted so the raised text sits between 48 and 60 inches above the floor, alongside the door on the latch side.

Older buildings: facilities built before these standards may have different obligations. An accessibility professional can tell you what applies to yours.

Maryland-Specific Regulations

Maryland adds its own layer on top of federal OSHA and the ADA: a state-run workplace safety program, its own food-service rules, statewide plumbing and accessibility codes, and a few restroom laws you won't find in other states.

Workplace Safety: MOSH

- ❑ Maryland runs an OSHA-approved State Plan, Maryland Occupational Safety and Health (MOSH), part of the Maryland Department of Labor. It covers private employers and state and local government employers.
- ❑ MOSH has adopted OSHA's general industry standards, including the sanitation standard in this guide (COMAR 09.12.31). There is no separate Maryland toilet standard for general industry.
- ❑ Employees can file a MOSH complaint online or by phone.

Food Service Facilities (COMAR 10.15.03)

Restaurants, food trucks and grocery stores follow Maryland's own food-service regulations, not the FDA Food Code. The Maryland Department of Health plans to adopt the 2022 FDA Food Code but hasn't set a date. Local health departments license and inspect.

- ❑ Toilet facilities sufficient in number, conveniently located and accessible to employees at all times (.18I)
- ❑ Customer toilets where you prepare food and provide seating, or offer indoor tables at a carry-out, for facilities established after January 1, 1979 (.18I)
- ❑ Toilet tissue at each toilet at all times, and covered, easily cleaned waste receptacles in women's toilet rooms (.18I)
- ❑ Toilet rooms that are fully enclosed, with self-closing doors, privacy and mechanical exhaust, and that don't open directly into the kitchen or food preparation areas (.18J)
- ❑ Handwashing facilities next to all toilet rooms, accessible at all times, with soap, towels in dispensers or an effective hand dryer, and a waste receptacle (.18K)
- ❑ Hot and cold running water, or tempered water of at least 100°F; metering faucets must run at least 15 seconds (.18L)

- ❑ Food prep sinks, utensil sinks and mop sinks never used for handwashing (.18M)
- ❑ Toilet room floors smooth, durable, nonabsorbent and easy to clean, and walls smooth and washable (.21)

Tip: Maryland's current rules don't require employee handwashing signs, but the 2022 FDA Food Code the state plans to adopt does. Posting them now costs nothing.

Plumbing Code and Fixture Counts

Maryland's statewide plumbing code is the 2021 International Plumbing Code (COMAR 09.20.01). Baltimore County and the WSSC area of Montgomery and Prince George's Counties have their own plumbing codes; WSSC's is based on the 2024 International Plumbing Code. Minimum fixtures (IPC Table 403.1), by occupant load:

OCCUPANCY	TOILETS	LAVATORIES	DRINKING FOUNTAINS
Business (offices)	1 per 25 for the first 50, then 1 per 50	1 per 40 for the first 80, then 1 per 80	1 per 100
Mercantile (retail)	1 per 500	1 per 750	1 per 1,000
Restaurants	1 per 75 for each sex	1 per 200	1 per 500
Places of worship	Men 1 per 150; women 1 per 75	1 per 200	1 per 1,000

Occupant load is split evenly between the sexes, rounding up. Each of these occupancies also needs a service sink, except business and mercantile spaces with 15 or fewer occupants.

- ❑ Customers, patrons and visitors must be given public toilet facilities, reached without passing through kitchens, storage rooms or closets, and open whenever the building is occupied (IPC 403.3). Small quick-transaction spaces and unattended parking garages are exempt.
- ❑ Required toilet facilities must be free of charge (IPC 403.3.5), and Maryland law bans charging a fee for any toilet required by law (Health-General § 24–208).
- ❑ Separate men's and women's facilities aren't required in spaces with 15 or fewer occupants, business spaces with 25 or fewer, or mercantile spaces with 100 or fewer (IPC 403.2).
- ❑ Single-user and family restrooms must be identified as available to everyone, regardless of sex (IPC 403.1.2). Montgomery County also requires gender-inclusive signs on single-occupancy public restrooms.

Accessibility: Maryland Accessibility Code (COMAR 09.12.53)

Maryland's accessibility code requires the 2010 ADA Standards in this guide, in effect statewide since January 1, 2012. Unlike the federal ADA, it also covers buildings owned or used by religious organizations and private clubs when they're built, added to or altered, so churches should check their restrooms against the ADA page.

Maryland Restroom Laws Worth Knowing

- ❑ **Ally's Law (Health-General § 24-209):** a retail store with an employee restroom must let a customer with an eligible medical condition, such as Crohn's disease, ulcerative colitis or an ostomy, use it when no public restroom is readily available and three or more employees are working. The customer shows a Maryland Department of Health card signed by their health care provider.
- ❑ **No pay toilets (Health-General § 24-208):** no fee may be charged for any toilet required by law in a public or private building.
- ❑ **Potty parity (Health-General § 24-211):** in places of public entertainment for more than 100 people permitted after May 1, 1993, women's restrooms need at least as many toilets as the men's restrooms have toilets and urinals combined.
- ❑ **Changing stations (State Finance and Procurement §§ 2-801 to 2-803):** buildings owned by the state or local governments or built for them to lease, including publicly funded transit stations, parks and recreation centers (not K-12 schools), need a changing station in at least one public restroom, or in at least one men's and one women's where restrooms are divided by gender. It applies when the building is built, a public restroom is built, or a public restroom is substantially renovated as the law defines it: child diaper stations for those projects on or after October 1, 2019, and stations that also serve adult personal care on or after October 1, 2022. A building inspector can waive it where it isn't practicable or would conflict with accessibility standards. Other private buildings aren't covered.
- ❑ **Menstrual products in schools (Education § 7-449):** public schools must provide free products in women's restrooms; middle and high schools in all women's restrooms since August 1, 2025.

Codes are changing: Maryland has proposed moving its building and plumbing codes to the 2024 International Codes, and plans to adopt the 2022 FDA Food Code. Check with your local code official or health department before a renovation.

Recommended Inspection Frequency

No single rule sets how often to check a restroom. The right schedule depends on facility size, traffic and industry. Use these guidelines as a starting point.

FACILITY TYPE	DAILY	WEEKLY	MONTHLY	QUARTERLY
Office (under 50 employees)	Supply check	Deep clean	Full audit	ADA review
Office (50+ employees)	2x supply check	Deep clean	Full audit	ADA review
Restaurant / food service	Every 2 hours	Deep clean	Full audit	Health dept. prep
Retail / public-facing	Every 4 hours	Deep clean	Full audit	ADA review
Warehouse / industrial	Supply check	Deep clean	Full audit + OSHA	ADA review
Healthcare	Every 2 hours	Deep clean	Full audit	Compliance review

Best practice: write every check down. A consistent log shows your restrooms are looked after, and it's your best record if a question ever comes up. The next page is a log you can print.

Daily Restroom Check Log

Print one sheet per restroom per day. Initial each check as you go, and note anything you had to fix or report.

Restroom / location: _____ Date: _____

CHECK	MORNING	MIDDAY	END OF DAY
Soap dispensers working and stocked			
Paper towels stocked, or hand dryers working			
Toilet paper stocked at every toilet			
Sinks and faucets clean, with running water			
Toilets and urinals clean and flushing			
Floors clean and dry			
Trash emptied; lids on covered bins			
Mirrors, counters and partitions clean; no odors			
Handwashing signs in place where required			
Grab bars secure; doors close and lock			
Time / initials			

Issues found and action taken

Reviewed by: _____

5 Problems to Fix Before an Inspector Visits

Each of these is easy to miss day to day, and each ties back to a specific rule in this guide.

1. Empty or Broken Soap and Towel Dispensers

OSHA requires hand soap and towels or air dryers at every lavatory, and Maryland's food-service rules require soap and a way to dry hands at every handwashing facility in a food business. An empty dispenser is also the easiest problem to prevent: keep supplies on a schedule, not on someone's memory.

2. Missing, Loose or Misplaced Grab Bars

The ADA sets the length, position and height of grab bars in accessible stalls: 33 to 36 inches above the floor, with a 42-inch side bar and a 36-inch rear bar. Loose or missing bars are a compliance gap and a safety hazard.

3. Too Few Toilets for Your Headcount

OSHA's Table J-1 counts employees of each sex on your busiest regular shift. Facilities that add staff often forget to check the fixture count.

4. Dispensers Mounted Out of Reach

Soap, towel and toilet paper dispensers have to be reachable: 15 to 48 inches above the floor for an unobstructed reach, and lower when someone has to reach over a counter. A new dispenser mounted at the old one's height can put you out of compliance.

5. Restricting Restroom Access

OSHA's interpretation of its sanitation standard says employers may not impose unreasonable restrictions on employees' restroom use. In Maryland, retail stores must also let customers with a documented medical condition use an employee restroom in some cases (Ally's Law).

Sources

Every requirement in this guide comes from the official text below, as checked in September 2026.

OSHA, 29 CFR 1910.141 — Sanitation

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.141>

OSHA interpretation of 29 CFR 1910.141(c)(1)(i): Toilet Facilities (April 6, 1998)

<https://www.osha.gov/laws-regs/standardinterpretations/1998-04-06-0>

OSHA, Maryland State Plan (MOSH); MOSH complaints

<https://www.osha.gov/stateplans/md> · <https://www.labor.maryland.gov/labor/mosh/complaintpage.shtml>

COMAR 09.12.31 — MOSH adoption of federal standards

<https://regs.maryland.gov/us/md/exec/comar/09.12.31.01>

U.S. Department of Justice, 2010 ADA Standards for Accessible Design

<https://www.ada.gov/law-and-regs/design-standards/2010-stds/>

COMAR 10.15.03 — Food Service Facilities (e.g. .18) and Health-General § 21–325

<https://regs.maryland.gov/us/md/exec/comar/10.15.03.18> ·

<https://mgaleg.maryland.gov/mgawebsite/Laws/StatuteText?article=ghg§ion=21-325>

COMAR 09.20.01 — State Plumbing Code (2021 IPC); WSSC Plumbing and Fuel Gas Code

<https://regs.maryland.gov/us/md/exec/comar/09.20.01.01> · <https://www.wsscwater.com/codebooks>

COMAR 09.12.51 — Maryland Building Performance Standards

<https://regs.maryland.gov/us/md/exec/comar/09.12.51.04>

COMAR 09.12.53 — Maryland Accessibility Code

<https://regs.maryland.gov/us/md/exec/comar/09.12.53>

Health-General § 24–209 (Ally's Law) and MDH restroom access page

<https://mgaleg.maryland.gov/mgawebsite/Laws/StatuteText?article=ghg§ion=24-209> ·

<https://health.maryland.gov/phpa/OEHFP/CHS/Pages/BathroomAccess.aspx>

Health-General §§ 24–208 and 24–211; State Finance and Procurement §§ 2–801 to 2–803; Education § 7–449

<https://mgaleg.maryland.gov/mgawebsite/Laws/StatuteText?article=ghg§ion=24-208>

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Let Us Handle Compliance

Loyal Facility Services provides managed restroom supply and hygiene programs for commercial facilities across Virginia, Maryland, and Washington, D.C.

Schedule a free hygiene consultation and facility walk-through. We will identify compliance gaps and recommend a program tailored to your facility.

(703) 361-7888

info@4loyalservices.com · 4loyalservices.com